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UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States Courts
Southern District of Texas
FILED

July 19, 2020

David J. Bradley, Clerk of Court

United States of America
v.

Case No. H-20-MJ-1276

Qusay Waleed Taha Taha
Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of July 2018 until present in the county of Harris in the Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § Section 922(a)(1)(A)

Engaged in the business of dealing firearms without a Federal Firearms License.

18 U.S.C. § 922(a)(6)

Providing a false or fictitious oral or written statement intended or likely to deceive such dealer with respect to any fact material to the lawfulness of the sale of such firearm in connection with the acquisition of a firearm from a licensed dealer.

18 U.S.C. § 924(a)(1)(A)

Knowingly make a false statement with respect to the records required to be kept by a Federal Firearms Licensee

This criminal complaint is based on these facts:

(see attachment)

☒ Continued on the attached sheet.


Complainant's signature

Ryan Dowling, Special Agent, FBI
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: July 19, 2020


Judge's signature

City and state: Houston, Texas

Hon. Peter Bray, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Ryan Dowling, being duly sworn, do hereby state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent Ryan Dowling with the Federal Bureau of Investigation (“FBI”) and have been so employed since July 2019. I am currently assigned to the Houston Field Office in Houston, Texas. I have received training in the preparation, presentation, and the service of criminal complaints and arrest and search warrants, and have been involved in the investigation of numerous types of offenses against the United States, including crimes involving providing material support or resources to designated foreign terrorist organization, knowing the act of transporting, shipping, or receiving a firearm with an altered serial number, and unlawful acts regarding firearms.

2. I am familiar with the circumstances of the offenses described in this affidavit through a combination of personal knowledge of the facts; discussion with other law enforcement officials; and other investigative activities conducted, and investigative materials obtained during the investigation.

PURPOSE OF THAT AFFIDAVIT

3. I make this affidavit in support of an application for issuance of a criminal complaint and arrest warrant for Qusay Waleed Taha Taha (TAHA), a 36-year-old resident in Houston, Texas, for violations of Title 18 United States Code, Section 922 and Section 924 in the Southern District of Texas, and elsewhere within the jurisdiction of the Court, from on or about July, 2018 to present. This affidavit does not include all facts known to me, but rather contains facts sufficient to support the issuance of an arrest warrant.

CRIMINAL OFFENSES ALLEGED

4. From on or about July 2018 to present, Title 18 United States Code, Section 922(a)(1)(A) - engaged in the business of dealing firearms without a Federal Firearms License.

5. From on or about July 2018 to present, Title 18 United States Code, Section 922(a)(6) - Providing a false or fictitious oral or written statement intended or likely to deceive such dealer with respect to any fact material to the lawfulness of the sale of such firearm in connection with the acquisition of a firearm from a licensed dealer.

6. From on or about July 2018 to present, Title 18 United States Code, Section 924(a)(1)(A) - Knowingly make a false statement with respect to the records required to be kept by a Federal Firearms Licensee.

7. Through my investigation, training, experience and in talking with other law enforcement personnel, who have conducted investigations on individuals trafficking in firearms, I know:

- a. That it is unlawful for any person except a licensed importer, licensed manufacturer or licensed dealer to engage in the business of importing manufacturing or dealing in firearms in violation of Title 18 United States Code (USC) Section 922(a)(1)(A).
- b. That it is unlawful for any person in connection with the acquisition of any firearm from a licensed dealer to knowingly make any false or fictitious oral or written statement intended or likely to deceive such dealer in violation of Title 18 USC Section 922(a)(6).
- c. That is unlawful for any person to knowingly make any false statement or representation with respect to the information required to be kept in the records of a Federal Firearms Licensee in violation of Title 18 USC Section 924 (a)(1)(A).
- d. That individuals involved in dealing firearms without a license often acquire

additional firearms, or replacement firearms, for their firearms inventory depleted through sales, when the opportunity or need arises. This commonly occurs through purchases from gun shops, gun shows, friends and acquaintances, newspaper want ads and the internet.

- e. That individuals involved in dealing firearms without a license often acquire multiple firearms of the same make, model and/or caliber.
- f. That individuals involved in dealing firearms without a license often make multiple purchases at one or more FFLs, over weeks or months.
- g. That persons or businesses engaged in the business of selling firearms must obtain, by federal law, an ATF issued Federal Firearms License (FFL).

EVIDENCE SUPPORTING CRIMINAL OFFENSES ALLEGED

8. Qusay Waleed Taha Taha is of Iraqi origin who resides in Houston, Texas. He was born in Baghdad, Iraq, on September 3, 1983, and he is a citizen and national of Iraq and a lawful permanent resident of the United States. Taha had previously worked with Iraqi Special Operations Forces from 2007 until 2013. Part of his duties included badging for the Green Zone and interpretation for Special Forces commanders and working on interpretations with human sources. Some of this interpretation was for the United States military. While in the Iraqi military, Taha had received weapons training, to include with the M4, AR15 and pistols.

9. On July 5, 2013 IIA-SGA, Inc. d/b/a Spring Guns and Ammo II was issued Federal Firearms License # 5-76-04080 operating in Spring, Texas. The license is valid as through August 1, 2022.

10. Between July 11, 2018 and November 30, 2018 Qusay Waleed TAHA TAHA purchased

the following twenty-eight (28) firearms from Spring Guns and Ammo II (FFL# 5-76-04080).

	Date	Manufacturer	Model	Serial Number	Caliber	Type
1	7/11/2018	Glock	19X	BHTV575	9mm	Pistol
2	7/11/2018	Glock	19X	BHNP462	9mm	Pistol
3	7/11/2018	Ruger	AR-556	853-41540	Multi	Receiver
4	7/11/2018	Aero Precision	X15	X049750	Multi	Receiver
5	10/12/2018	Glock	19X	BKBU010	9mm	Pistol
6	10/12/2018	Glock	19X	BGWV372	9mm	Pistol
7	10/12/2018	Glock	42	ACGH748	.380 ACP	Pistol
8	10/12/2018	Glock	19X	BGWV372	9mm	Pistol
9	10/12/2018	FN Herstal	FiveseveN	386350229	5.7mm	Pistol
10	10/12/2018	FN Herstal	FiveseveN	386353398	5.7mm	Pistol
11	10/12/2018	Spikes Tactical	ST15	SHM007379	Multi	Receiver
12	10/12/2018	Sharps Bros.	THE JACK	1318	Multi	Receiver
13	10/12/2018	Sharps Bros.	THE JACK	1319	Multi	Receiver
14	10/12/2018	Battle Arms	BAD556-LW	L005340	Multi	Receiver
15	10/12/2018	Battle Arms	BAD556-LW	L005316	Multi	Receiver
16	10/12/2018	Battle Arms	BAD556-LW	L005341	Multi	Receiver
17	10/12/2018	North American Arms	Mini-Rev	L210633	.22 LR	Receiver
18	11/30/2018	FN Herstal	FiveseveN	386339801	5.7mm	Pistol
19	11/30/2018	FN Herstal	FiveseveN	386339803	5.7mm	Pistol
20	11/30/2018	FN Herstal	FiveseveN	386339804	5.7mm	Pistol
21	11/30/2018	FN Herstal	FiveseveN	386346429	5.7mm	Pistol
22	11/30/2018	Battle Arms	BAD556-LW	L005455	Multi	Receiver
23	11/30/2018	North American Arms	Mini-Rev	L213475	.22 LR	Revolver
24	11/30/2018	North American Arms	Mini-Rev	L213457	.22 LR	Revolver
25	11/30/2018	Sig Sauer	P320	M17-054791	9mm	Pistol
26	11/30/2018	Sig Sauer	P320	M17-082615	9mm	Pistol

27	11/30/2018	FN Herstal	FiveseveN	386339802	5.7mm	Pistol
28	11/30/2018	FN Herstal	509	GKS0054599	9mm	Pistol

11. An ATF Special Agent (SA) examined copies of the ATF 4473 Forms (4473), Firearms Transaction Record Part 1-Over-the Counter, completed by TAHA on July 11, 2018; October 12, 2018 and November 30, 2018 for the firearms he purchased from Spring Guns and Ammo. TAHA completed each form and received the firearms. During the completion of the form TAHA answered “YES” to question 11.a. which asks “Are you the actual transferee/buyer of the firearm(s) listed on this form? **Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you. Exception: If you are picking up a repaired firearm(s) for another person, you are *not* required to answer 11.a. and may proceed to question 11.b. (See Instructions for Question 11.a.).** Additionally, all firearms were found to effect interstate and foreign commerce as they were manufactured outside of the state of Texas.

12. On July 17, 2016 Texas Tactical Guns LLC, d/b/a Texas Tactical Guns & Range was issued Federal Firearms License # 5-76-05296 operating in Spring, Texas. The license is valid through August 1, 2022.

13. On February 14, 2019 TAHA purchased the following firearms from Texas Tactical Guns & Range (FFL: 5-76-05296).

	Date	Manufacturer	Model	Serial Number	Caliber	Type
1	2/14/2019	FN Herstal	FiveseveN	386359681	5.7mm	Pistol
2	2/14/2019	FN Herstal	FiveseveN	386359679	5.7mm	Pistol
3	2/14/2019	Spikes	ST15	SHM011109	.223	Receiver

14. An ATF Special Agent (SA) examined a copy of the 4473 Form, completed by TAHA on February 14, 2019 for the firearms he purchased from Texas Tactical Guns & Range. TAHA completed the form and received the firearms. During the completion of the form TAHA answered “YES” to question 11.a. which asks “Are you the actual transferee/buyer of the firearm(s) listed on this form? **Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you. Exception: If you are picking up a repaired firearm(s) for another person, you are *not* required to answer 11.a. and may proceed to question 11.b. (See Instructions for Question 11.a.).** Additionally, all firearms were found to effect interstate and foreign commerce as they were manufactured outside of the state of Texas.

15. On July 14, 2009 CC Plus II, Inc. was issued Federal Firearms License # 5-76-02419 operating in Conroe, Texas. The license is valid through August 1, 2021.

16. Between February 15, 2019 and April 22, 2019 TAHA purchased the following eight (8) firearms from CC Plus II (FFL: 5-76-02419).

	Date	Manufacturer	Model	Serial Number	Caliber	Type
1	2/15/2019	FN Herstal	FiveseveN	386348379	5.7mm	Pistol
2	2/15/2019	Sig Sauer	P320	58C188334	9mm	Pistol
3	3/19/2019	Sig Sauer	P320M17	M17-089044	9mm	Pistol
4	4/22/2019	North American Arms	Mini	L209901	.22	Revolver
5	4/22/2019	North American Arms	Belt Buckle	L207007	.22	Revolver
6	4/22/2019	FN Herstal	FiveseveN	386355540	5.7mm	Pistol
7	4/22/2019	Sig Sauer	P320 X-Five	58H045904	9mm	Pistol
8	4/22/2019	Sig Sauer	P320 M17	M17-074647	9mm	Pistol

17. An ATF Special Agent (SA) examined copies of the 4473s, completed by TAHA on

February 15, 2019, March 19, 2019 and April 22, 2019 for the firearms he purchased from CC Plus II. TAHA completed the forms and received the firearms. During the completion of the forms TAHA answered “YES” to question 11.a. which asks “Are you the actual transferee/buyer of the firearm(s) listed on this form? **Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you.** *Exception: If you are picking up a repaired firearm(s) for another person, you are not required to answer 11.a. and may proceed to question 11.b. (See Instructions for Question 11.a.).* Additionally, all firearms were found to effect interstate and foreign commerce as they were manufactured outside of the state of Texas.

18. On May 2, 2008 ACME Motors Corporation, d/b/a AJC Sports Inc. was issued Federal Firearms License # 5-76-02010 operating in Clute, Texas. The license is valid through June 1, 2023.

19. On March 16, 2019 TAHA purchased the following two (2) firearms from AJC Sports Inc. (FFL# 5-76-02010) at a gun show in Pasadena, Texas.

	Date	Manufacturer	Model	Serial Number	Caliber	Type
1	03/16/2019	FN Herstal	Fiveseven	386364853	5.7mm	Pistol
2	03/16/2019	FN Herstal	509	GKS0049791	9mm	Pistol

20. An ATF Special Agent (SA) examined a copy of the 4473, completed by TAHA on March 16, 2019 for the firearms he purchased from AJC Sports, Inc. TAHA completed the form and received the firearms. During the completion of the form TAHA answered “YES” to question 11.a. which asks “Are you the actual transferee/buyer of the firearm(s) listed on this form? **Warning: You are not the actual transferee/buyer if you are acquiring the**

firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you. Exception: If you are picking up a repaired firearm(s) for another person, you are *not* required to answer 11.a. and may proceed to question 11.b. (See Instructions for Question 11.a.). Additionally, all firearms were found to effect interstate and foreign commerce as they were manufactured outside of the state of Texas.

21. On July 17, 2018 Ally Outfitters Inc., d/b/a Ally Outfitters was issued Federal Firearms License # 5-75-14066 operating in Midland, Texas. The license is valid through August 1, 2021.

22. On March 16, 2019 TAHA purchased the following two (2) firearms from Ally Outfitters. (FFL# 5-75-14066) at gun show in Pasadena, Texas.

	Date	Manufacturer	Model	Serial Number	Caliber	Type
1	03/16/2019	FN Herstal	FiveseveN	386363833	5.7mm	Pistol
2	03/16/2019	Sig Sauer	P320	58A198122	9mm	Pistol

23. An ATF Special Agent (SA) examined a copy of the 4473, completed by TAHA on March 16, 2019 for the firearms he purchased from Ally Outfitters. TAHA completed the form and received the firearms. During the completion of the form TAHA answered “YES” to question 11.a. which asks “Are you the actual transferee/buyer of the firearm(s) listed on this form? **Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you. Exception: If you are picking up a repaired firearm(s) for another person, you are *not* required to answer 11.a. and may proceed to question 11.b. (See Instructions for Question 11.a.).** Additionally, all firearms were found to effect interstate and foreign commerce as they were manufactured outside of the state of Texas.

24. On October 31, 2018 Texas Tactical Gear & Firearms, INC. d/b/a Guns Unlimited was issued Federal Firearms License # 5-76-06174 operating in Katy, Texas. The license is valid through November 1, 2021.

25. Between March 16, 2019 and August 17, 2019 TAHA purchased the following sixty (60) firearms from Guns Unlimited (FFL# 5-76-06174).

	Date	Manufacturer	Model	Serial Number	Caliber	Type
1	3/16/2019	FN Herstal	FiveseveN	386355458	5.7mm	Pistol
2	4/24/2019	FN Herstal	FiveseveN	386364482	5.7mm	Pistol
3	4/24/2019	FN Herstal	FiveseveN	386364489	5.7mm	Pistol
4	4/24/2019	FN Herstal	FiveseveN	386364490	5.7mm	Pistol
5	4/24/2019	FN Herstal	FiveseveN	386364487	5.7mm	Pistol
6	5/21/2019	Beretta	APX	A103926X	9mm	Pistol
7	5/21/2019	Smith & Wesson	M&P M2.0	NCN5113	9mm	Pistol
8	5/24/2019	Walther	Q5	FCW6158	9mm	Pistol
9	5/24/2019	Sig Sauer	M17	M17-060061	9mm	Pistol
10	5/24/2019	Zev	OZ	ZEV-OZ-1052	9mm	Pistol
11	6/1/2019	North American Arms	Pug	PG42617	.22	Revolver
12	6/1/2019	North American Arms	Pub	PG42365	.22	Revolver
13	6/1/2019	Sig Sauer	P320 X-Five	58H096584	9mm	Pistol
14	6/10/2019	FN Herstal	FiveseveN	386365496	5.7mm	Pistol
15	6/10/2019	FN Herstal	FiveseveN	386365828	5.7mm	Pistol
16	6/10/2019	FN Herstal	FiveseveN	386365830	5.7mm	Pistol
17	6/10/2019	FN Herstal	FiveseveN	386365827	5.7mm	Pistol
18	6/11/2019	FN Herstal	FiveseveN	386363848	5.7mm	Pistol
19	6/11/2019	FN Herstal	FiveseveN	386367254	5.7mm	Pistol
20	6/11/2019	FN Herstal	FiveseveN	386363844	5.7mm	Pistol
21	6/11/2019	FN Herstal	FiveseveN	386370107	5.7mm	Pistol
22	6/12/2019	Sig Sauer	P320 X-Five	58H014633	9mm	Pistol
23	6/12/2019	North American Arms	Mini Rev	L218697	.22	Revolver

24	6/12/2019	North American Arms	Mini Rev	L218771	.22	Revolver
25	6/12/2019	North American Arms	Mini Rev	L218772	.22	Revolver
26	7/6/2019	Beretta	APX	A103322X	9mm	Pistol
27	7/6/2019	H&K	VP9	224-246251	9mm	Pistol
28	7/6/2019	Walther	PPQ Q5 Match	FCV2591	9mm	Pistol
29	7/6/2019	Zev	OZ9	ZA00965	9mm	Pistol
30	7/12/2019	Zev	OZ9	ZA00970	9mm	Pistol
31	7/12/2019	Zev	OZ9	ZA00332	9mm	Pistol
32	7/12/2019	Zev	OZ9	ZA00334	9mm	Pistol
33	7/12/2019	Zev	OZ9	ZEV-0Z1056	9mm	Pistol
34	7/19/2019	Kel-Tec	PMR30	WXDV58	.22	Pistol
35	7/19/2019	Kel-Tec	PMR30	WXDZ52	.22	Pistol
36	7/19/2019	Kel-Tec	PMR30	WXDZ53	.22	Pistol
37	7/22/2019	Maxim Defense	PDX	MXM_18_10536	5.56mm	Pistol
38	7/31/2019	FN Herstal	FiveseveN	386365272	5.7mm	Pistol
39	7/31/2019	FN Herstal	FiveseveN	386365274	5.7mm	Pistol
40	7/31/2019	FN Herstal	FiveseveN	386365275	5.7mm	Pistol
41	8/6/2019	Kel-Tec	PMR30	WXDH60	.22	Pistol
42	8/6/2019	Kel-Tec	PMR30	WXDH61	.22	Pistol
43	8/6/2019	Kel-Tec	PMR30	WXEQ83	.22	Pistol
44	8/8/2019	FN Herstal	FiveseveN	386370379	5.7mm	Pistol
45	8/8/2019	FN Herstal	FiveseveN	386370373	5.7mm	Pistol
46	8/8/2019	Zev	OZ9	ZA00306	9mm	Pistol
47	8/8/2019	Zev	OZ9	ZA00318	9mm	Pistol
48	8/10/2019	Kel-Tec	PMR30	WXDZ29	.22	Pistol
49	8/10/2019	FN Herstal	FiveseveN	386370371	5.7mm	Pistol
50	8/10/2019	FN Herstal	FiveseveN	386370372	5.7mm	Pistol
51	8/10/2019	Zev	OZ9	ZA00963	9mm	Pistol
52	8/13/2019	FN Herstal	FiveseveN	386370376	5.7mm	Pistol
53	8/13/2019	FN Herstal	FiveseveN	386370377	5.7mm	Pistol

54	8/13/2019	FN Herstal	FiveseveN	386370383	5.7mm	Pistol
55	8/13/2019	FN Herstal	FiveseveN	386370384	5.7mm	Pistol
56	8/15/2019	FN Herstal	FiveseveN	386370416	5.7mm	Pistol
57	8/15/2019	FN Herstal	FiveseveN	386370382	5.7mm	Pistol
58	8/17/2019	Zev	OZ9	ZA00234	9mm	Pistol
59	8/17/2019	Zev	OZ9	ZA01012	9mm	Pistol
60	8/17/2019	Zev	OZ9	ZA01015	9mm	Pistol

26. An ATF Special Agent (SA) examined copies of the 4473s, completed by TAHA on March 16, 2019; April 24, 2019; May 21, 2019; May 24, 2019; June 1, 2019; June 10, 2019; June 11, 2019; June 12, 2019; July 6, 2019; July 12, 2019; July 19, 2019; July 22, 2019; July 31, 2019; August 6, 2019; August 8, 2019; August 10, 2019; August 13, 2019; August 15, 2019 and August 17, 2019 for the firearms he purchased from Guns Unlimited. TAHA completed the forms and received the firearms. During the completion of the forms TAHA answered “YES” to question 11.a. which asks “Are you the actual transferee/buyer of the firearm(s) listed on this form? **Warning: You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer the firearm(s) to you. Exception: If you are picking up a repaired firearm(s) for another person, you are *not* required to answer 11.a. and may proceed to question 11.b. (See Instructions for Question 11.a.).** Additionally, all firearms were found to effect interstate and foreign commerce as they were manufactured outside of the state of Texas.

27. Also, at the end of Section A of each of the 4473s completed by TAHA for all of the aforementioned Firearms transactions, the following is written,

“I certify that my answers in Section A are true, correct, and complete. I have read and understand the Notices, Instructions, and Definitions on ATF Form 4473. I understand

that answering "yes" to question 11.a. if I am not the actual transferee/buyer is a crime punishable as a felony under Federal law, and may also violate State and/or local law. I understand that a person who answers "yes" to any of the questions 11.b. through 11.i and/or 12.b. through 12.c. is prohibited from purchasing or receiving a firearm. I understand that a person who answers "yes" to question 12.d.1. is prohibited from receiving or possessing a firearm, unless the person answers "yes" to question 12.d.2. and provides the documentation required in 18.c. I also understand that making any false oral or written statement, or exhibiting any false or misrepresented identification with respect to this transaction, is a crime punishable as a felony under Federal law, and may also violate State and/or local law. I further understand that the repetitive purchase of firearms for the purpose of resale for livelihood and profit without a Federal firearms license is a violation of Federal law. (See Instructions for Question 14.)”

28. On February 15, 2019 Ryan Skar, Regional Operations Manager, Spring Guns & Ammo sent an email to an ATF Industry Operations Investigator (IOI), stating the Woodlands, Texas location of Spring Guns & Ammo declined to sell TAHA six (6) handguns on February 13-14, 2019. The email further explained that on February 13, 2019 TAHA came to the store with a cash payment in order to purchase five (5) FN Herstal, model FivesevenN pistols and one (1) Beretta, model APX pistol. TAHA requested to pick up all the pistols on February 15, 2019 after the Beretta was in stock. Mr. Skar in his email also stated that *“His unusual pattern of purchases and multiple requests for the same type of pistols makes his intent questionable and management/ownership uncomfortable.”* Additionally, all firearms were found to effect interstate and foreign commerce as they were manufactured outside of the state of Texas.

29. On September 10, 2019 TAHA agreed to meet with and speak with Department of Homeland Security Investigations (HSI) and ATF Special Agents. TAHA confirmed he had received a letter dated September 4, 2019 requesting he contact ATF about his recent firearms purchases. During the interview TAHA stated that he purchases firearms for the purpose of selling them at local gun shows. TAHA stated that he would keep the firearms in a bag and attach a handwritten sign advertising which firearms he had for sale on that given day. TAHA also stated that his purpose for buying and selling firearms was to make a profit on the firearm sales and to supplement his income. At the time of his interview, TAHA stated that earns approximately \$1500.00 per month as an Uber driver which is not enough to pay his rent and live on. TAHA also said that he is part owner of a company based in Iraq that supplies bath and restroom supplies. TAHA stated that he will periodically receive money from his Iraq-based company. However, payments are not made at regular intervals. During the interview TAHA confirmed that his last firearms purchase was on August 17, 2019. On that day TAHA picked up the firearms from Guns Unlimited then left the country the same evening. TAHA stated he left the firearms at his apartment. TAHA stated he returned to the United States on September 7, 2019. On September 8, 2019 TAHA said he attended a gun show at the George R. Brown Convention Center and sold the three (3) Zev, OZ9, 9mm pistols for approximately \$700 profit.

30. On October 08, 2019, a government database revealed serial number: 224-246251 BK DE (Walther PPQ) corresponds to the weapon sold by Houston-based gun dealer Said M. AbouMerhi (ABOUMEHRI), date of birth July 29, 1960, to Qusay Waleed Taha Taha in Houston.

31. In an interview with TAHA's brother, Ahmed Waleed TAHA (AHMED), on or about November 7, 2019, AHMED stated that he and his brother TAHA were Sunni Muslims from Iraq. AHMED told the interviewers that he visited TAHA in jail due to a domestic violence charge TAHA had with his wife the day prior. AHMED mentioned that TAHA has a few Iraqi friends in Houston. The friends that were mentioned were Marwan and Ziad. TAHA said Marwan was the manager of an oil company and was uncertain if Ziad had a job.

32. On November 19, 2019, an interview with TAHA revealed that TAHA said his company provides multiple services for the Embassy, such as UPS power supplies, etc., and does about \$600,000-\$800,000 in revenue annually. TAHA said he has a partner in Iraq name Ali Salman. TAHA was also asked about a question on his application which he answered that he had never sold weapons to another person. After being confronted with the fact that he has sold multiple weapons, TAHA could not explain the reason for the answer on the application. TAHA stated that after moving to the U.S. he purchased, and subsequently sold, multiple firearms. Although initially hesitant to provide the number of firearms he had purchased and sold, TAHA eventually stated the number was close to one hundred. TAHA claimed the firearms were purchased from various retail firearms dealers and were all sold at local gun shows. TAHA claimed the sales were to individuals who only purchased one firearm at a time, but no records were ever kept.

33. In an FBI interview with TAHA on or about January 13, 2020, TAHA stated he purchased firearms from ABOUMEHRI of Guns Unlimited. TAHA stated he subsequently sold all of the firearms.

34. According to an FBI interview with ABOUMEHRI, on or about January 23, 2020, at Guns Unlimited in Katy, Texas, and a records review of the same, TAHA purchased 57 guns

from the dealer between the months of March and August in 2019. The same dealer alleged TAHA purchased twice as many guns from another Houston-based gun dealer, Spring Guns and Ammo, in the same time period.


35. In a subsequent FBI interview with an employee of Spring Guns and Ammo, the employee confirmed TAHA purchased multiple firearms from Spring Guns and Ammo during that time.

36. In an FBI interview with TAHA on January 27, 2020, TAHA stated that he never sold guns to any Iraqi or to other Arabs. TAHA never sold guns to any Iraqi or to other Arabs. The only people he sold guns to were white guys and black guys. TAHA never sold more than one gun to any individual except one time he sold two guns to an old, white guy.

37. On April 5, 2020 a query through the ATF Federal Licensing System revealed that TAHA currently does not have nor did he have a Federal Firearms License between July 2018 and November 2019.

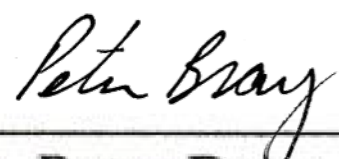
CONCLUSION.

Based on the aforementioned factual information, your Affiant respectfully submits that there is probable cause to believe that QUSAY WALEED TAHA TAHA violated 18 U.S.C. §§ 922(a)(1)(A), 922(a)(6), and 924(a)(1)(A).



RYAN DOWLING
Federal Bureau of Investigation
Special Agent
Houston, Texas

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1
by telephone on this 19 day of July, 2020, at, Houston, Texas.



Hon. Peter Bray
U.S. MAGISTRATE JUDGE